


**FEMA**

November 29, 2024

Neil Thompson  
New York City Office of Management and Budget  
255 Greenwich Street, 8<sup>th</sup> Floor  
New York, NY 10007

Re: Shelter and Services Program (SSP) Post Award Joint Financial and Programmatic Monitoring Results Letter

Dear Mr. Thompson:

The purpose of this letter is to provide the results of the joint financial and programmatic monitoring site visit conducted by the Grant Programs Directorate on September 9, 2024. The monitoring included a review of the City of New York Office of Management and Budget's progress in effectively implementing its SSP award (EMW-2023-SP-05027) and the agency's compliance with all applicable federal requirements and regulations.

Included below are observations and recommendations that require corrective actions. We are asking the City of New York Office of Management and Budget (NYC OMB) to provide a written response within **30 days** from receipt of the letter, but no later than **December 30, 2024**, with a corrective action plan to address the recommendations. All correspondence related to this matter should be addressed to your Shelter and Services Program (SSP) POC with a copy to the SSP Branch at [fema-ssp@fema.dhs.gov](mailto:fema-ssp@fema.dhs.gov).

Compliance Review Results	
Corrective Action	Response due to FEMA
<p><b>SSP - Programmatic</b></p> <p>NYC OMB provided a detailed privacy policy via Attachment 7a. Citywide Privacy Protection Policies and Protocols. However, it is still not clear how NYC OMB ensures secure data entry of migrant A-Numbers into the city's record-keeping system (or systems) and how this data is securely exported into SSP's A-Number template (e.g., who exports A-Number data from NYC's central data repository). As part of joint monitoring, SSP recipients are requested to provide a copy of the specific steps followed when reporting A-Number data via the A-Number template.</p>	<p>NYC OMB is required to provide a copy of the specific steps followed with reporting A-Number data via the A-number template and to demonstrate the security of the A-number tracking.</p>

<p><a href="#">2 CFR 200.327 Contract Provisions</a></p>	<p>When addressing FEMA’s intent to monitor letter, SSP recipients are requested to provide copies of contracts supported by SSP funds. Specifically, FEMA sent the following request: “if your organization executed any contracts with your SSP funding, please submit the following:</p> <ul style="list-style-type: none"> <li>• RFPs and other documentation to show compliance with federal, state, or local procurement policies.</li> <li>• Copies of received bids/quotes.</li> <li>• Copies of executed contract(s)/purchase order; statements of work.”</li> </ul> <p>NYC OMB provided the requested contracts. FEMA SSP is in the process of reviewing the contracts and will communicate with NYC OMB if there are any issues once the review is complete.</p>
<p>2 CFR 200.302(b)(7) <a href="#">eCFR :: 2 CFR 200.302 -- Financial management.</a></p> <p><b>Financial Management</b></p> <p>NYC OMB provided written responses to FEMA’s questions, but did not provide documentation or any written / formally acknowledged policies or procedures addressing the following:</p> <ul style="list-style-type: none"> <li>• Delegation of authority and associated considerations</li> <li>• A description of OMB’s internal project budget revision process</li> <li>• Grant-funded project budget and expenditure monitoring</li> <li>• Cost transfers/expenditure reclassifications between projects and awards:</li> </ul>	<p>NYC OMB is required to submit written policies and procedures that address grant management practices to include:</p> <ul style="list-style-type: none"> <li>• delegation of authority</li> <li>• budget revision process</li> <li>• grant-funded project budget and expenditure monitoring</li> <li>• cost transfers/expenditure reclassification between projects and awards</li> <li>• NYC OMB’s expenditure approval process</li> <li>• Procedures for determining allowability of costs.</li> </ul>

<ul style="list-style-type: none"> <li>• NYC OMB’s expenditure approval process</li> <li>• Procedures for determining the allowability of costs.</li> </ul> <p>Absent an organizationally recognized policy, it is impossible to identify potential process risks or internal control gaps, nor is it possible to assess NYC OMB’s implementation of the stated practices. Furthermore, <u>2 CFR 200.302b7</u> requires the maintenance of “written procedures for determining the allowability of costs in accordance with <u>2 CFR 200 Subpart E</u> and the terms and conditions of the Federal award.”</p>	
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We would like to take this opportunity to thank you and your staff for being very helpful and cooperative in providing GPD with the information requested for conducting the site visit.

Sincerely,

*Betsy Hernandez*

Betsy Hernandez, CGMS  
Branch Chief, Shelter and Services Program

cc: Official Grant File